

**Exhibit B**

**March 24, 2022, LAN Outline**

**Gov. Rick Snyder**

Areas of anticipated and permissible testimony:

**(1) Topics, subjects and documents covered in the depositions.** See summary below. Under the Court's ruling, examination as to these areas and documents should be allowed without objection, including exploration as to further details or aspects of the topics regardless of whether specifically asked in the deposition, *e.g.*, getting the Flint Water Treatment Plant ready to start using the Flint River by April 2014, the failure to use orthophosphates as part of the water treatment process, the parties involved in those events and the roles they played, and the allegations in Plaintiffs' Complaint regarding the witness.

**(2) Topics, subjects or documents not covered in the depositions because the information was learned later or due to other constraints.** Examples include information revealed at depositions taken after the witness's deposition, areas not covered because of time constraints on individual parties' examination, or information revealed during the witness's trial testimony that prompt examination as to further details, accuracy or credibility of the trial testimony.

**(3) Additional permissible topics, subjects or documents not covered in the depositions.** Examples include (1) the fact that the witness is facing criminal prosecution under charges related to the Flint Water Crisis; (2) the official duties and responsibilities of the witness in his capacity as a government official, appointee or employee; (3) other prior testimony, *e.g.*, Congressional hearings, criminal examining trials, governmental interviews or testimony, *etc.*.

**(4) Any areas, topics or documents identified by VNA.** LAN adopts by reference any areas, topics or documents identified by co-defendant VNA as areas of examination of the witness.

**Summary of Deposition Topics & Exhibits**

<b>Topic</b>	<b>Pages</b>
Personal History, Education and Work History	17-29, 131-132
Gubernatorial campaign and election, organization of Governor's office and selection of administration personnel (Muchmore, Baird, Roberts, Clement), state agencies, practices and procedures while in office	29-54, 182-184
Views on Leadership and Decision Making	32-33, 37-40, 225-226
History of knowledge and involvement of administration in Flint Water Crisis	54-61,
Review and reaffirmation of Congressional testimony	61-71, 83-89, 102-103
Payment of legal fees	70-72
Supervision of Emergency Managers, MDEQ, and MDHSS	107-109, 116-117, 260-262, 656-664
Decision to switch from DWSD to KWA	102-127, 133-158, 279-306, 307-310, 678-683, 810-812

Use of Flint River as an Interim Source and activity during period	102-104, 127-130, 132-33, 163-166, 184-195, 211-279, 305-307, 310-328, 329-357, 511-524, 576-669
City's plan to use phosphate as late as March 26, 2014	572-576
Discovery of lead and precursor and subsequent actions	231-249, 260-277, 339-346, 353-357, 518-523, 548-560, 592-620, 667-670, 823-
Discovery of contaminants and Legionella, and response to same	88-90, 158-163, 274-279, 459-496, 664-667, 683-745, 806-810
Failures and responsibility of various governmental agencies, organizations and individuals	73-107, 256-257, 260-269, 442-443,
Flint Water Advisory Task Force	93-100, 532-540, 674-678, 765-770
EPA Emergency Administrative Order	249-256, 507-510, 673-674
Declaration of State of Emergency	498-506, 770-773
VNA activities	359-382, 587-618, 630-642, 652-654, 775-800, 801-805, 813-818
LAN activities	408-438, 630-640, 644-654
Investigations and Audits (Flint Water Advisory Task Force, Office of Auditor General, criminal investigations, Congressional hearings)	440-455, 531-540, 649-654, 674-678, 765-770
Terminations and Resignations	818-822
Charges and Disciplinary Actions	525-530
ODWMA Lead and Copper Rule Implementation Policies and Procedures	540-548
Condition of and Composition of Service Lines in Flint	561-571
Hypothetical actions if given certain notices by VNA or LAN	357-358, 372-373, 379-380, 424-425, 432, 670-673, 800-801
EPA activities	250-255, 507-518, 600-618, 747-764, 823-830

LAN Trial Exhibit #	Document Date	Description	Deponent	Depo Ex. #
3301	03/17/2016	"House Oversight and Government Reform Committee Holds Hearing on Flint, Michigan Water Crisis, Part 3	Rick Snyder - GOV	<a href="#">1</a>
3302	03/21/2016	Flint Water Advisory Task Force Report	Rick Snyder - GOV	<a href="#">2</a>
3303	03/17/2013	Email chain re: Flint Water Supply alternatives	Rick Snyder - GOV	<a href="#">3</a>
3304	03/26/2013	Email chain re: Flint draft response	Rick Snyder - GOV	<a href="#">4</a>
3305	04/04/2013	E-mail string re: KWA	Rick Snyder - GOV	<a href="#">5</a>
3306	04/04/2013	E-mail string re: week DWSD to present counter proposal	Rick Snyder - GOV	<a href="#">6</a>
3307	04/17/2013	E-mail re: water meeting with governor	Rick Snyder - GOV	<a href="#">7</a>
3308	04/17/2013	DWSD's Notice of Termination of Flint Water Supply Contract	Rick Snyder - GOV	<a href="#">8</a>
3309	04/17/2013	Calendar Invite for meeting re KWA & DWSD	Rick Snyder - GOV	<a href="#">9</a>
3310	04/20/2013	Email re: summary of meeting with Gov about DWSD	Rick Snyder - GOV	<a href="#">10</a>
3311	04/29/2013	Email chain re: Flint adhered to plan by rejecting DWSD offer	Rick Snyder - GOV	<a href="#">11</a>
3312	04/25/2013	Email re: DWSD's responses to Flint's questions	Rick Snyder - GOV	<a href="#">12</a>
3313	10/01/2014	Email re: City of Flint Drinking Water - Governor's Office Briefing Paper	Rick Snyder - GOV	<a href="#">13</a>
3314	10/14/2014	Email re: Flint water escalating - need to discuss concerns	Rick Snyder - GOV	<a href="#">14</a>
3315	11/26/2014	Email re: Darnell Earley being out in February and no new EM being put in	Rick Snyder - GOV	<a href="#">15</a>
3316	01/19/2015	Email re: Flint Mayor letter to governor	Rick Snyder - GOV	<a href="#">16</a>
3317	02/05/2015	Email chain re: Pastor Harris and water concerns.	Rick Snyder - GOV	<a href="#">17</a>
3318	03/03/2015	Email chain re: buying water for residents temporarily	Rick Snyder - GOV	<a href="#">18</a>
3319	10/13/2015	Email attaching Flint Quality Report	Rick Snyder - GOV	<a href="#">19</a>
3320	07/22/2015	Email re: notes from meeting with Flint Clean Water Coalition	Rick Snyder - GOV	<a href="#">20</a>
3321	07/22/2015	Calendar invite re: meeting about Flint/KWA	Rick Snyder - GOV	<a href="#">21</a>
3322	07/24/2015	Email re: DWSD corrosion control study and Flint lead history - keep internal	Rick Snyder - GOV	<a href="#">22</a>

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3323	09/26/2015	Email re: Flint updates attaching lead advisory release	Rick Snyder - GOV	<a href="#">23</a>
3324	03/22/2016	Transcript of Gov. Rick Snyder Flint/Frank Beckmann Show WJR	Rick Snyder - GOV	<a href="#">24</a>
3325	01/21/2016	Emergency Administrative Order	Rick Snyder - GOV	<a href="#">25</a>
3326	09/28/2015	"Flint Water Timeline"	Rick Snyder - GOV	<a href="#">26</a>
3327	04/20/2013	Email re: summary of meeting with Gov about DWSD	Rick Snyder - GOV	<a href="#">27</a>
3328	03/19/2014	E-mail chain re: Tom handling getting DEQ approval of the Flint project	Rick Snyder - GOV	<a href="#">28</a>
3329	09/10/2014	Email re: John Gleason letter to Governor - issue getting bigger	Rick Snyder - GOV	<a href="#">29</a>
3330	09/10/2014	Letter re: drinking water concerns	Rick Snyder - GOV	<a href="#">30</a>
3331	10/01/2014	DEQ Governor's Office Briefing Paper, City of Flint Drinking Water	Rick Snyder - GOV	<a href="#">31</a>
3332	07/22/2015	Email re: look into Flint. Residents are getting "blown off" by state	Rick Snyder - GOV	<a href="#">32</a>
3333	02/02/2015	Email string re: consulting in Flint - residents unhappy with water quality. Potential lawsuits. City's expectation on consultant is unrealistic.	Rick Snyder - GOV	<a href="#">33</a>
3334	02/09/2015	Email chain re: Help with Flint Journal article	Rick Snyder - GOV	<a href="#">34</a>
3335	02/09/2015	Email chain re: Help with Flint Journal article	Rick Snyder - GOV	<a href="#">35</a>
3336	02/09/2015	Email chain re: Help with Flint Journal article. Leads seems to be problem.	Rick Snyder - GOV	<a href="#">36</a>
3337	02/13/2015	Email re: make it clear quickest option is to return to Detroit water	Rick Snyder - GOV	<a href="#">37</a>
3338	06/10/2013	LAN Proposal for Flint Water Treatment Plant Rehabilitation - Phase II	Rick Snyder - GOV	<a href="#">38</a>
3339	07/01/2020	LAN website printout	Rick Snyder - GOV	<a href="#">39</a>
3340	09/16/2014	Internal McLaren Document	Rick Snyder - GOV	<a href="#">40</a>
3341	09/30/2014	Internal McLaren Document	Rick Snyder - GOV	<a href="#">41</a>
3342	10/03/2014	Email re: McLaren Bacteria Brief	Rick Snyder - GOV	<a href="#">42</a>
3343	11/05/2014	Letter re: Legionella sampling at McLaren on 10/25/2014	Rick Snyder - GOV	<a href="#">43</a>
3344	11/18/2014	Letter re: Legionella sampling at McLaren on 11/7/2014	Rick Snyder - GOV	<a href="#">44</a>

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3345	11/15/2014	Internal McLaren Document	Rick Snyder - GOV	<a href="#">45</a>
3346	12/03/2015	Internal McLaren Document	Rick Snyder - GOV	<a href="#">46</a>
3347	12/02/2014	Letter re: Legionella sampling at McLaren on 11/24/2014	Rick Snyder - GOV	<a href="#">47</a>
3348	12/23/2014	Letter re: Legionella sampling at McLaren on 12/5 - 12/9	Rick Snyder - GOV	<a href="#">48</a>
3349	12/15/2019	Memo re: Investigation of healthcare associated Legionnaires' disease - Flint, Michigan, January 2018-June 2019	Rick Snyder - GOV	<a href="#">49</a>
3350	12/14/2015	Declaration of State of Emergency	Rick Snyder - GOV	<a href="#">50</a>
3351	01/05/2016	Declaration of Emergency	Rick Snyder - GOV	<a href="#">51</a>
3352	02/05/2016	Subject: Notice of charges and Disciplinary Action	Rick Snyder - GOV	<a href="#">52</a>
3353	01/17/2013	ODWMA Policy and Procedure, Subject: Lead and Copper Rule Implementation	Rick Snyder - GOV	<a href="#">53</a>
3354	03/23/2016	Transcript of Miguel Del Toral	Rick Snyder - GOV	<a href="#">54</a>
3355	10/01/2015	Letter re: assessment of the water quality and health issues in Flint	Rick Snyder - GOV	<a href="#">55</a>
3356	08/12/2013	Email re: 24" water main on Pasadena and continued issues	Rick Snyder - GOV	<a href="#">56</a>
3357	03/26/2014	Email re: MAIL allocation	Rick Snyder - GOV	<a href="#">57</a>
3358	01/22/2015	Email chain re: water forum	Rick Snyder - GOV	<a href="#">58</a>
3359	01/05/2015	"Flint residents call for investigative hearings into 'water crisis'"	Rick Snyder - GOV	<a href="#">59</a>
3360	01/22/2015	"Who wants to drink Flint's water?"	Rick Snyder - GOV	<a href="#">60</a>
3361	02/13/2015	Handwritten notes - Veolia Update	Rick Snyder - GOV	<a href="#">61</a>
3362	02/18/2015	Handwritten notes titled "Corrosion Control Checking	Rick Snyder - GOV	<a href="#">62</a>
3363	02/24/2015	Email chain re: Leanne Walters - 212 Browning. Indicates a larger potential problem in the system	Rick Snyder - GOV	<a href="#">63</a>
3364	03/03/2015	Email chain re: High Lead - Flint Water testing results	Rick Snyder - GOV	<a href="#">64</a>
3365	03/02/2015	Email chain re: Leanne Walters	Rick Snyder - GOV	<a href="#">65</a>
3366	03/02/2015	Handwritten document titled "Exec"	Rick Snyder - GOV	<a href="#">66</a>

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3367	03/03/2015	Email chain re: contaminated water in Flint. Seeing price of water.	Rick Snyder - GOV	<a href="#">67</a>
3368	03/04/2015	PowerPoint presentation titled "City of Flint, MI Water Quality Report, Technical Advisory Committee"	Rick Snyder - GOV	<a href="#">68</a>
3369	03/05/2015	Email re: Tech Committee Follow up	Rick Snyder - GOV	<a href="#">69</a>
3370	03/12/2015	Flint, Michigan Water Quality Report	Rick Snyder - GOV	<a href="#">70</a>
3371	09/29/2015	Response to Treasury Questions	Rick Snyder - GOV	<a href="#">71</a>
3372	10/21/2015	Press Release : Gov Rick Snyder announces Flint Water Task Force to review state, federal and municipal actions, offer recommendations	Rick Snyder - GOV	<a href="#">72</a>
3373	01/22/2016	Email chain re: Recommendations for Flint Water System and Legionella	Rick Snyder - GOV	<a href="#">73</a>
3374	02/06/2016	E-mail chain Re: Query from DEQ re Genesee County Legionnaire's Disease Cluster	Rick Snyder - GOV	<a href="#">74</a>
3375	01/28/2015	Email re: help offered to health dept to investigate legionnaires	Rick Snyder - GOV	<a href="#">75</a>
3376	02/06/2016	Email fw: chain regarding legionella	Rick Snyder - GOV	<a href="#">76</a>
3377	01/28/2015	Email chain re: county health dept's FOIA request	Rick Snyder - GOV	<a href="#">77</a>
3378	01/30/2015	Email chain re: FOIA Request Flint Water	Rick Snyder - GOV	<a href="#">78</a>
3379	03/12/2015	E-mail string ending with an e-mail to Ms. Shekter-Smith and others from Mr. Busch, dated 3/12/2015	Rick Snyder - GOV	<a href="#">79</a>
3380	03/13/2015	Email re: FOIA Request Flint Water Part II	Rick Snyder - GOV	<a href="#">80</a>
3381	04/21/2015	Email chain re: potential legionella issue in Genesee County	Rick Snyder - GOV	<a href="#">81</a>
3382	05/29/2015	Summary of Legionella Outbreak - Genesee County, June 2014-March 2015	Rick Snyder - GOV	<a href="#">82</a>
3383	02/04/2016	Email FW: chain re: Gov's admin aware of surge in Legionnaires' disease	Rick Snyder - GOV	<a href="#">83</a>
3384	01/14/2016	Letter to President re: request to declare state of emergency	Rick Snyder - GOV	<a href="#">84</a>
3385	04/14/2015	Report 8: Epi-Curve Graph, 1-1-2010 - 4-14-2015	Rick Snyder - GOV	<a href="#">85</a>
3386	08/29/2017	Environmental Science & Technology article titled "Distribution System Operational Deficiencies Coincide with Reported Legionnaires' Disease Clusters in Flint, MI"	Rick Snyder - GOV	<a href="#">86</a>

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3387	08/08/2016	Enhanced Disease Surveillance and Environmental Monitoring in Flint, Michigan, Phase II Project Report	Rick Snyder - GOV	<a href="#">87</a>
3388	10/02/2015	Email chain re: R5 Weekend Update	Rick Snyder - GOV	<a href="#">88</a>
3389	03/30/2015	THM Treatment Strategies - for Flint, Michigan (Technical Memo)	Rick Snyder - GOV	<a href="#">89</a>